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9 Attorneys for Plaintiff

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11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14
15 UNITED STATES OF AMERICA,) No.: CR 3-05-70262 JL
16 Plaintiff,)
17 v.) STIPULATION AND [PROPOSED]
18 TIFFANY STUART, aka Jane Doe,) PROTECTIVE ORDER REGARDING
JENNIFER LANGE, and) COMPUTER DISCOVERY AS TO
BRANDY DOUGLAS,) DEFENDANTS STUART, LANGE AND
Defendants.) DOUGLAS
21 _____)

22
23 The United States, through its counsel of record, and the defendants, through their
24 counsel of record, hereby agree and stipulate that the government will provide computer
25 discovery (consisting of seized computer evidence) on the following conditions:

26 The computer discovery produced in this matter is deemed Protected Material.

27 Possession of copies of the Protected Material is limited to the defendants, their attorneys of
28

No.: CR 3-05-70262 JL
STIP. & [PROPOSED] PROT. ORDER RE COMPUTER
DISCOVERY AS TO DEFS STUART, LANGE & DOUGLAS

1 record, and investigators, paralegals, law clerks, translators, interpreters, experts and assistants
2 for the attorneys of record (hereinafter collectively referred to as "members of the defense team").

3 The defendants, their attorneys of record, and members of the defense team acknowledge
4 that providing copies of the Protected Material to other persons is prohibited, and agree not to
5 duplicate or provide copies of the Protected Material to other persons. The defendants, their
6 attorneys of record, and members of the defense team may show Protected Material to witnesses
7 or prospective witnesses in conjunction with their defense of the defendants in this case. The
8 defendants, their attorneys of record, and members of the defense team further acknowledge that
9 they are prohibited from using the Protected Material for any purpose other than defending the
10 defendant in the above-captioned matter. Any violation of these prohibitions constitutes a
11 violation of the Protective Order. Further, the attorneys of record agree that prior to
12 disseminating any copies of the Protected Material to members of the defense team, they will
13 provide a copy of this Protective Order to members of the defense team.

14 Notwithstanding efforts taken by the government to redact personal information of
15 witnesses from the discovery provided to the defense (such as date of birth, social security
16 numbers, addresses, phone numbers, etc.), defense counsel, the defendants and members of the
17 defense team agree that, should any such information be found during their review of this
18 material, they will not provide that personal information in any form – whether in verbal, written
19 or electronic format – to any third party, for any reason whatsoever.

20 2 Nontermination

21 The provisions of this Order shall not terminate at the conclusion of this prosecution but
22 only upon further order of this Court. Within 30 days of a verdict or guilty plea, the defendants'
23 attorneys of record shall return all copies of any Protected Material (including all copies provided
24 to the defendants, their attorneys of record, and members of the defense team) to the United
25 States Attorney's Office for the Northern District of California.

1 IT IS SO STIPULATED.
2

3 DATED: October 14, 2005

/s/ Monica Fernandez
MONICA FERNANDEZ
Assistant United States Attorney
Counsel for the United States

6 DATED: October 3, 2005

/s/ Josh Cohen
JOSH COHEN
Counsel for Defendant STUART

8 DATED: October 3, 2005

/s/ Suzanne Luban
SUZANNE LUBAN
Counsel for Defendant LANGE

11 DATED: October 13, 2005

/s/ Geoffrey Rotwein
GEOFFREY ROTWEIN
Counsel for Defendant DOUGLAS

14 **ORDER**

15 PURSUANT TO STIPULATION, IT IS SO ORDERED.

17 DATED: October 14, 2005

